U.S. Department of the Interior – Bureau of Reclamation

SAN LUIS DRAINAGE FEATURE RE-EVALUATION

Meeting Summary
Public Scoping Meetings
January 27, 2003 – Morro Bay, California
January 28, 2003 – Fresno, California
January 29, 2003 – Concord, California
January 31, 2003 – Sacramento, California

Introduction

Reclamation has identified the proposed action for the San Luis Unit Drainage Feature Re-evaluation (SLDFR) in the Plan Formulation Report (December 2002) and is focusing on the environmental review process required under the National Environmental Policy Act (NEPA). To begin this process, Reclamation issued a Notice of Intent to prepare an Environmental Impact Statement (EIS) in September 2001, and held a series of public scoping meetings in November 2001. Following the distribution of the Plan Formulation Report (PFR) in December 2002, Reclamation held a second series of scoping meetings.

Meeting Purpose and Objectives

The purpose of the additional public scoping meetings was to receive public comments on the proposed action and alternatives described in the PFR. Meetings were held in a wider geographic area (Morro Bay as well as Fresno, Concord and Sacramento) to obtain comments on specific issues to be evaluated in the EIS.

Presentation

Jason Phillips, Reclamation, provided a brief history of the project bringing the audience up to date on the project information. Jason reviewed the In-Valley, Delta, and Ocean Disposal alternatives and explained the evaluation factors and screening criteria that were applied to determine the proposed In-Valley action. Jason then presented the steps that Reclamation will follow in the environmental review process.

Public Scoping Comment Summary

The following summarizes the concerns, questions, and issues that were presented by meeting participants. A scoping report that will be developed for release in May 2003 will summarize this input, as well as written comments received, and identify those that are appropriate to be addressed specifically in the SLDFR EIS.

January 27, 2003 – Morro Bay, California

Environmental Impact Statement Scoping Comments

The EIS should include information about how the ocean currents would disperse and dilute material released at Point Estero.

What water quality tests include information about presence of nitrates in drainwater?

Describe how a federal action would be coordinated with other releases such as brine released from the Chevron plant. Describe how the cumulative actions could impact marine life.

Disclose potential impacts within the whole sanctuary not just to the boundary.

Address valley land use in cumulative impacts. Analyze appropriate land use within the valley.

Analyze cumulative impacts with all sources of pollution (including future discharges) to the ocean. Disclose who is responsible for dumping what materials and how to track these discharges.

Does the Secretary of the Interior have the discretion to select an alternative other than what Reclamation recommends in the EIS?

Plan Formulation Report Comments

Reclamation needs to describe how the review process for the Ocean Disposal would include local efforts to extend the marine sanctuary to include Point Estero, Morro Bay, etc.

Explain if the Ocean Disposal alternative includes use of any existing pipelines. Would their use be precluded in the future?

What practices on-farm are currently in use? This information would help to determine what changes and levels of improvement could be achieved by requiring implementation of these practices.

Address potential for natural disasters causing failure at discharge point and in transport system.

Did the evaluation of the Ocean Disposal alternative include public opposition within the cost analysis?

Why does the PFR not include Broadview Water District's cost data on selenium bio-treatment?

Alternative Options Comments

Land Retirement:

Completely address economic impacts of land retirement.

Other General Comments

When did the salt and selenium become a problem? What is the source of the salt selenium?

Describe what assistance is going to farmers to manage land to produce food for a growing population with scarce water resources.

Some of the reports used by Reclamation for endangered marine species are dated in the 1980s. Reclamation needs updated information on endangered species.

The community in Cayucos is very concerned about the potential selection of the Ocean Disposal alternative. Future meetings should be held in Cayucos.

Is this problem a result of inappropriate crops being grown on the wrong land?

The drainage from the Valley should stay in the Valley.

January 28, 2003 – Fresno, California

Environmental Impact Statement Scoping Comments

The EIS needs to describe water sources for wildlife mitigation efforts.

What protections to wildlife will be included in the EIS?

Will NEPA precede the California Environmental Quality Act (CEQA)? A CEQA review should be completed for this re-evaluation.

Plan Formulation Report Comments

Has the interest in recycling groundwater among farmers been assessed?

What is the State Water Resources Control Board role in this process?

Was the cost of bird "hazing" included in PFR analysis? What about other avoidance measures?

How did you identify 370,00 acres as the amount of drainage impaired land? The number of acres used for analysis (approx. 250,000 acres) appears to be different.

The useful life of evaporation ponds in the PFR was estimated at 50 years or longer. In previous reports (Rainbow Report) it was set at 30 years. Why is there a difference?

The Luoma-Presser Report challenges the probable success of Delta Discharge. Why is Delta Disposal still an option?

All 5,000 acres of evaporation ponds will be an attractive nuisance. The ponds should be made bird safe/proof.

Alternative Options Comments

Land Retirement:

Land retirement (WWD) will help alleviate the problem.

In Valley Evaporation Ponds:

Include any impacts to terrestrial wildlife resources that would result from implementation of the In-Valley Alternative.

Who operates the In-Valley Disposal option facilities (State or Fed)?

How will the evaporation ponds in the In-Valley option be capped? How is selenium build-up in the ponds mitigated? Will the cap contain the selenium?

Other General Comments

All the options are too expensive. What is the likelihood that Congress will fund the proposed action?

January 29, 2003 – Concord, California

Environmental Impact Statement Scoping Comments

Review potential impacts of evaporation ponds on birds. The creation of 5,000 acres of evaporation ponds holds potential to recreate Kesterson.

The water quality analysis should address bromides and organic carbon for drinking water concerns.

Disclose form of selenium that results from the bio-treatment process. Residual selenium could be more harmful.

Plan Formulation Report Comments

Set water quantity and quality limits on drainwater Reclamation will accept from farmers.

Reconsider on-farm activities that were eliminated in previous evaluations, as they are appropriate to the environmentally preferred alternative.

Ensure that reuse areas can be maintained on a long-term basis without producing water with higher concentrations of salt that would lead to the need for even more tolerant crops.

What were the assumptions used for evaporation pond design and mitigation?

The Regional Water Quality Control Board has already set selenium limits in the Delta to manage current discharges (e.g. local refineries). Reclamation would need to coordinate efforts of a Delta Disposal with those industries.

Alternative Options Comments

Land Retirement:
The EIS should include another alternative with more land retirement.

Discuss how recent developments in land retirement affect this effort. EIS should go beyond the court order to incorporate land retirement. Include information on repayment impacts if land is retired.

Disclose cost analysis of land fallowing including benefits of not using water or selling water. Irrigation efficiency analysis should also include the same benefits.

Whether land retirement is part of this effort or not, do not ignore its reality and impacts on drainage service picture.

In Valley Evaporation Ponds:
Revisit logic and costs supporting in-valley alternative components before deciding extent of reuse/evaporation facilities. Revisit salt reclamation/marketing options (alternatives to evaporation ponds). Review incentives for innovative farm practices like Grasslands. Do not lock in now, set future decision point.

Disclose cost of potential for leakage in evaporation ponds and cost for double lined ponds.

A preferred alternative should include land retirement, sequential on-farm reuse, salt reclamation, and reduction of water applied.

In Valley solutions should move forward. Add to list of impacts and perform more rigorous evaluation. This will likely reveal greater impacts. The assumptions used currently also lead to an overestimation of water needing to be drained.

There is a need to get project going and adapt as they go along.

Do not lose valuable water to evaporation. Clean up that water and use it.

Other General Comments

Disclose specifics about repayment terms and numbers in the EIS to reflect true cost to the federal government and the farmers.

The Bay Institute, Contra Costa County, Contra Costa Water Agency, Contra Costa Water District, and Environmental Defense have released Drainage Without A Drain – Toward a Permanent, Responsible Solution to the Agricultural Drainage Problem in the San Joaquin Valley. This briefing book describes an environmental alternative they would like evaluated in the EIS.

Who pays for implementation and installation of drainage program elements?

Are farmers willing to accept recycled water with potential constituents such as boron and others?

January 31, 2003 – Sacramento, California

Environmental Impact Statement Scoping Comments

Disclose in EIS how to mitigate impacts to Westlands area from loss of farm jobs and other economic impacts.

Study the economic impact of retiring lands, including environmental justice issues.

Include analysis of chemical concentrations in soils as well as groundwater (chromium, molybdenum, and boron).

Review all impacts of reverse osmosis from costs, reliability, carbon emissions, to global warming.

Plan Formulation Report Comments

Include those farmers and water districts that contribute drainage with high levels of selenium to the Delta Mendota Canal (e.g. Firebaugh Water District).

Describe the extent that Reclamation would be prepared to reduce irrigation water by implementing effective irrigation technologies. Show the level of reduction in drainwater volume.

How did you determine which lands are included in drainage service plan? How can you justify lands outside the San Luis Unit?

The cost of reverse osmosis treatment seems low. Is this because Reclamation would use cheap project power? Will Reclamation use Central Valley Project power for these facilities?

Why has Reclamation assumed responsibility to plan the regional facilities? If the government has the discretion to determine acceptable drainwater, then have water district and farmers take on the responsibility to meet those requirements.

Why is Reclamation taking on liability of impaired lands for reuse?

Did the court determine that land retirement was specifically prohibited as part of providing drainage service?

Have the US Fish & Wildlife Service and US Geological Survey been involved in the Re-evaluation?

The approach Reclamation is pursuing is too narrow. Look at better uses of Central Valley Project water and regain tribal trust in Trinity River area.

An inherent conflict exists with Reclamation evaluating this proposed action. There should be another entity to oversee the process.

The project goal should be to reduce the number of evaporation ponds in the San Joaquin Valley.

The best way to reduce drainage is reduce amount of water applied. Water rights imperiled when water use is inappropriate.

Alternative Options Comments

Land Retirement:
To provide a full range of alternatives in the EIS, a pure land retirement alternative (with water) is needed, for the purpose of comparing costs. Disclose how long it would take to repay the entire investment through sale of water.

Identify alternative that includes land retirement (at least 200,000 acres) and returning water to Trinity County and Trinity River.

EIS must review the economic losses to communities if a land retirement strategy is pursued.

EIS must include a fully analyzed land retirement alternative.

Alternative in EIS should be buy out irrigators, retain water, and end cost to taxpayers.

Need clarification about how land retirement will decrease drainage need if the water rights stay with the water district.

In Valley Evaporation Ponds:
Study alternatives to evaporation ponds, especially on-farm actions before government takes drainage; such as Red Rock Ranch techniques; changing to crops that use less water; solar.

Identify lands that can reduce CVP water impact on leach rates of more sandy westside lands irrigated.

Red Rock system has less impact on wildlife than evaporations ponds, however it doesn't work for larger scale operations.

Other General Comments

Demonstrate that upslope lands in Westlands Water District remaining in production do not contribute to Se pollution (western lands have greatest concentration). Disclose impact of water application on these lands to water quality in aquifers.

Disclose relationship between Trinity River and the San Luis Unit. Examine documentation for place of water use, impact of polluting San Joaquin Valley, impact on fish, and Native American water rights.

Costs/benefit analysis must include disclosure of agricultural subsidies, showing the actual cost for sustainability of agriculture in Westlands Water District – cost of "Life Support System"

Include costs that taxpayers are responsible for to cover fish and wildlife projects.

Determine water savings and how value of this water could be used to repay capital as well as avoided costs on other water facilities.

How will the EIS display payment details?

Taxpayers have not been paid back for the Central Valley Project investment.

Has Westlands Water District chosen land retirement as their preferred alternative for the 200,000 acres under negotiations?

Meeting Participants

Morro Bay

Supervisor Shirley Bianchi, San Luis Obispo County Board of Supervisors
John Chesnut, Agrarian Research
Don Dollar, Resident
Carrie Fuller, Morro Bay Resident
Pam Heatherington, Environmental Center of San Luis Obispo
Richard Macedo, San Luis Obispo County Board of Supervisors
David Sneed, The San Luis Obispo Tribune
Jason Phillips, Reclamation
Marian Echeverria, Reclamation
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Scott Irvine, Reclamation
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Robert Davis, Reclamation
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Jennifer Allen, Public Affairs Management

Fresno

Lloyd Carter, Save Our Streams
Emelia Berol, Humbolt Watershed Council

Thad Bettner, Westlands Water District
Joe McGahan, Summers Engineering
Karri Hammerstrom, Fresno County Farm Bureau
Julie Vance, CA Department of Water Resources
Anthony Toto, Regional Water Quality Control Board
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David Sholes, Regional Water Quality Control Board
Clay Rodgers, Regional Water Quality Control Board
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Concord

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Richard Denton, Contra Costa Water District
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Theresa Presser, US Geological Survey
David Cory, San Joaquin River Exchange Contractors Water Authority
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Ron Enzweiler, Water Tech Partner
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Sacramento

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Joy Winckel, US Fish & Wildlife Service
David Nesmith, Environmental Water Caucus
Erin Sickler, San Joaquin County
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Debra Kloss, CA Environmental Protection Agency
Jan West, Reclamation
D.A. Tuma, Libertarian Party
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Wayne Verrill, State Water Resources Control Board
Anthony Toto, Regional Water Quality Control Board
Dan Kippen, Smiland & Khachigan
Bob Wunner, Humboldt Watershed Council
Steve Brown, Environmental Science Associates
Bob Yound, Reclamation
Tom Stokely, Trinity County Planning
Greg Mongano, Reclamation
Steven Sherer, Reclamation
Wayne Cooley, Central Valley Regional Water Quality Control Board
Emily Hart, Independent
John Brooks, US Fish & Wildlife Service
Homira Shafar, State Water Resources Control Board
Eric Oppenheimer, Central Valley Regional Water Quality Control Board

Lori Clamurro, Delta Protection Commission
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